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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
MAIL BRANCH

WASHINGTON, D.C.

In the matter of )  
Amendment of Section 73.202(b) ) Re: MM docket No. 92-146  
Table of FM Allotments ) RM-8019  
Mammoth Lakes, California )

COMMENTS FAVORABLE TO THE PROPOSED FM UPGRADE  
FOR MAMMOTH LAKES, CALIFORNIA  
MM DOCKET 92-146

Comes now, Mammoth Mountain FM Associates, Inc. (the petitioner)  
request the commission to amendment Section 73.202(b) of the  
Commission's rules to amend the FM Table of allotments as  
proposed in docket 92-146, as below:

<u>CITY</u>	<u>EXISTING</u>	<u>PROPOSED</u>
Mammoth Lakes, California	292 A	293 B-1

In Support whereof the following is shown:

1. Mammoth Mountain FM Associates, Inc., Licensee of radio station KMMT (FM), seeks to upgrade KMMT (FM) signal level from the petitioners current transmitter site to provide Mammoth Lakes and the surrounding areas of Mono County in California with a improved level of service to the public. The petitioner pleads the Commission issue KMMT a new class "B-1" allocation on channel 293 and if approving the new allocation, delete the current class "A" allocation on channel 292 and modify KMMT current station license consistent with the petitioners request.

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2. The attached engineering report and spacing study shows that the upgrade as proposed using the current transmitter site (37:37:40 N, 119:01:56 W) will conform with current FCC spacing requirements (73.207) and that there are not other petitions or application that conflict with this rulemaking request (see exhibit E-1 attached).

3. The petitioner believes that there would be great public benefit if the commission should grant this upgrade request. KMMT Serves a earthquake prone area and provides the only local broadcast service license to Mammoth Lakes and to all of Mono County. If granted, KMMT will provide a improved level of service to the Mono County towns of June Lake 18 miles, Lee Vining 26 miles and to Bridgeport (Mono county seat) 50 miles to the north all have no local service. KMMT currently has emergency back-up power and is the only local broadcast service in Mono County in place to provide emergency communication to Mono county as the CPCS-1 station. Mammoth Lakes and the surrounding area has had a number of large earthquakes and some underground magma activity just in the past few years. KMMT is the only broadcast service licensed or allocated to the area. KMMT is working closely with local officials to provide emergency communications to the area in the event of an emergency.

4. The petitioner will, without undue delay, apply for and construct transmission facilities on channel 293 at a power level consistent with Class B-1 operation if this rulemaking request is granted.

CAT. NO. NN01500  
TO 2930 (12-90)

 **TICOR TITLE INSURANCE**

(General Acknowledgment)

STATE OF CALIFORNIA

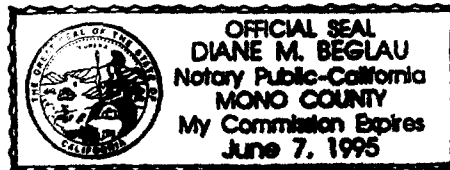
COUNTY OF Mono } ss.

On August 20, 1992 before me, the undersigned, a Notary Public in and for said State,  
personally appeared David A. Digerness

personally known to me (or proved to me on the basis of satisfactory evidence) to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

WITNESS my hand and official seal.

Signature Diane M. Beglau



(This area for official notarial seal)

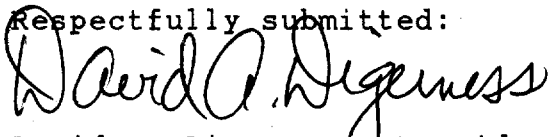
5. This upgrade request is consistent with current FCC rules and policies and would provide a fair and equitable use of the FM spectrum for an remote area that is currently under served by broadcast stations.

In conclusion, Mammoth Mountain FM Associates, Inc. pleads the Commission Allot FM channel 293-B-1 in place of channel 292-A for Mammoth Lakes, California for use by radio station KMMT (FM) from the petitioners current transmitter site and that the Commission, if approving this petition, will modify KMMT's current license consistent with the new channel and power level.

Prepared by:  
David Quinlan, consultant  
(916) 842-4635

The undersigned verifies that, to the best of his knowledge, the information contained in these comments and previous information submitted in the petition for rulemaking submitted to the Commission are correct, complete and are consistent with current Commission rules and policies.

Respectfully submitted:



David A. Digerness, President  
Mammoth Mountain FM Associates, Inc.  
Post Office Box 1284  
Mammoth Lakes, California 93546  
(619) 934-2591

EXHIBIT E-1  
FM SPACING REPORT AND STUDY  
BY DAVID QUINLAN  
ENGINEERING CONSULTANT

The attached FM Spacing study by Dataworld (DW, Inc.) was compiled from the FCC database available May 19, 1992 using the coordinates of KMMT's current transmitter site (37-37-40 N 119-01-56 W).

The study shows that three other licensed station are close but do not infringe in to the minimum distances required for this allotment request... KKDJ Fresno 290B is equaled to the minimum distance required 71 km, KWOD Sacramento 293B is 2 km further than the minimum distance required 211 km, and KJUG Tulare 294B is 5 km further than the minimum distance required 145 km.

From the proposed (current) transmitter site KMMT upgrade request complies with the spacing requirements as set in FCC rules 73.207.

Note: distances above are rounded to the nearest kilometer as per FCC rules.

Prepared by:



David Quinlan, Consultant  
P.O. Box 125  
Yreka, Ca 96097

FM Spacing study

Title: KMMT  
Channel 293B1 (106.5 MHz)  
Database: DW 05/18/92

Latitude: 37-37-40  
Longitude: 119-01-56  
Safety zone: 45 km

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
KJFX	LIC	BROWN BROADCASTING COMPA	239B	17.5	36-56-55	208.1	85.44	17
FRESNO	CA	BLH-880616KB	95.7	259	119-29-09	27.8	68.44	CLEAR
Was KYNO-FM 03/30/90 per FCC release #131 dated 04/06/90; Affiliated with KYNO(AM)								
KNTD	LIC	DANIEL FORRESTALL	240A	3	37-18-57	257.4	153.5	12
LIVINGSTON	CA	BLH-841113KK	95.9	91	120-43-20	76.4	141.5	CLEAR
See DENAIR CA								
KKDJ	LIC	PACIFIC QUADRACASTING	290B	2.40	37-04-23	209.9	70.97	71
FRESNO	CA	BLH-791203AF	105.9	597	119-25-51	29.6	.03	
Affiliated with KBBK(AM)								
NEW	APP	CALAVERAS INSPIRATIONAL	291A	1.60	38-13-36	300.1	134.5	48
ARNOLD	CA	BPH-911031MB	106.1	191	120-21-43	119.3	86.49	CLEAR
Received per FCC release #15124 dated 11/08/91, tendered per 15184 dated 01/31/92, accepted per NA-157 dated 03/12/92								
KMMT	LIC	MAMMOTH MOUNTAIN FM ASSO	292A	.06	37-37-40	.0		96
MAMMOTH LAKES	CA	BLH-810122AE	106.3	658	119-01-56	.0	-96	SHORT
KDAY	CP	BENETT KESSLER	292A	3	36-50-00	141.2	112.9	96
INDEPENDENCE	CA	BPH-880519MF	106.3	-492	118-14-17	321.7	16.87	CLEAR
Deletion proposed; CP Granted 03/14/91 per FCC release #21077 dated 03/23/91; ORDERED TO 223B; Call Granted 05/03/91 per FCC release #157 dated 05/03/91								
KDAT	CP	MERCED COMMUNICATIONS	292A	2.50	37-26-08	260.7	126.2	96
MERCED	CA	BPH-911210IH	106.3	151	120-26-23	79.8	30.22	CLEAR
CP Granted 03/31/92 per FCC release #21351 dated 04/06/92; Was KBCY 09/15/89								
KDAT	LIC	MERCED COMMUNICATIONS	292A	2.95	37-25-34	260.2	126.4	96
MERCED	CA	BMLH-901119KC	106.3	145	120-26-23	79.3	30.41	CLEAR
License Granted 08/26/91 per FCC release #21197 dated 08/30/91; Was KBCY 09/15/89; Ant: Elec. Res. Inc. FML-4								
KWOD	LIC	ROYCE INTERNATIONAL BROA	293B	50	38-38-30	302.7	212.7	211
SACRAMENTO	CA		106.5	94	121-05-25	121.4	1.657	CLOSE
KWOD	CP	ROYCE INTERNATIONAL BROA	293B	50	38-38-30	302.7	212.7	211
SACRAMENTO	CA	BPH-830616AA	106.5	125	121-05-25	121.4	1.657	CLOSE
CP Granted 03/29/89								
KEZR	LIC	ALTA BROADCASTING COMPAN	293B	50	37-21-43	263.8	242.7	211
SAN JOSE	CA		106.5	131	121-45-23	82.2	31.71	CLEAR
KJUG-FM	LIC	WESTCOAT BROADCASTING IN	294B	1.20	36-17-08	173.3	150.0	145
TULARE	CA	BLH-860930KD	106.7	778	118-50-17	353.5	4.953	CLOSE
Was KJUG 10/23/89; Affiliated with KJUG(AM)								

DAVID QUINLAN  
YREKA, CA

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May 19, 1992

FM Spacing study

Title: KMMT  
Channel 293B1 (106.5 MHz)

Latitude: 37-37-40  
Longitude: 119-01-56

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
KQLB	CP	VLB BROADCASTING, INC.	295A	6	36-55-35	244.6	178.6	48
LOS BANOS	CA	BMPH-910913IB	106.9	100	120-50-42	63.5	130.6	CLEAR
CP Granted 01/29/92 per FCC release #21309 dated 02/06/92;								
Call Granted 07/26/91 per FCC release #163 dated 07/26/91								

KAAT	LIC	CALIFORNIA SIERRA CORPOR	296A	.28	37-25-08	249.7	66.26	48
OAKHURST	CA	BLH-841123LW	107.1	326	119-44-04	69.2	18.26	CLEAR

>> End of channel 293B1 study <<